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**FILED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MAY 28 2021

THOMAS G. BRUTON'  
CLERK, U.S. DISTRICT COURT

<b>LANCE DOLPH SCOTT,</b>	)	CASE NUMBER
	)	<b>1:21-cv- 01383</b>
Plaintiff, Self-Represented,	)	JURY TRIAL DEMANDED
	)	
-vs-	)	
	)	Harry D. Leinerweber, District Judge
<b>LUKE ANDREW CASSON, ET. AL.,</b>	)	Suni R. Hariani, Magistrate Judge
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR JUDGMENT BY DEFAULT AGAINST  
DEFENDANTS LUKE ANDREW CASSON, ANDREOU & CASSON,..  
ELIZABETH A. GRANOFF AND LAW OFFICE OF ELIZABETH A. GRANOFF  
PURSUANT TO FRCP RULE 55(b)(1)**

**INTRODUCTION**

**COMES NOW** United States Federal Government citizen, LANCE DOLPH SCOTT, plaintiff, self-represented, reserving all of my rights, and waiving none, ever, and submits my motion for judgment by default against defendants Luke Andrew Casson, Andreou & Casson, Elizabeth A. Granoff, Law Office of Elizabeth A. Granoff pursuant to frcp rule 55(b)(1) seeking of this Court, by the Clerk, to enter Default Judgment against defendants Luke Andrew Casson, Andreou & Casson, Elizabeth A. Granoff and Law Office of Elizabeth A. Granoff for their failure to Appear after being served with Summons and Complaint pursuant to frcp rule 55(a)(1).

**PROCEDURAL BACKGROUND**

On or about the 17<sup>th</sup> day of March, 2021, pursuant to Rule 4(c)(1)(2) of the Federal Rules of Civil Procedure, via the U.S. Postal Service, I certified mailed a copy of my

Respectfully submitted

By James D. Scott

:Lance – Dolph :Scott  
Plaintiff, Self-Represented

:Lance – Dolph :Scott  
In care of 708 Sugar Creek Drive  
Township of Joliet/Will County  
Republic of Illinois [60433]  
(815) 768-7828

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Defendants.	)	

**PLAINTIFF LANCE DOLPH SCOTT'S DELARATION FOR DEFAULT  
JUDGMENT PURSUANT TO FRCP RULE 55(b)(1)**

I, Lance Dolph Scott, plaintiff self-represented declare if called upon could competently testify to the following claims from my own personal knowledge.

I am the plaintiff, self-represented in the above caption cause and the moving party for this default judgment against defendants Luke Andrew Casson, Andreou & Casson, Elizabeth A. Granoff, and Law Offices of Elizabeth A. Granoff in reference to Counts IV to VII of the verified complaint.

I am making this declaration to set forth the amount due per Count of the verified complaint directed against defendants Luke Andrew Casson, Andreou & Casson, Elizabeth A. Granoff, and the Law Offices of Elizabeth Granoff

Count II Title 42 U.S.C. Section 1985(3) Conspiracy To Interfere With Rights  
Defendant Luke Andrew Casson, Andreou & Casson, Elizabeth . Granoff, Law Office of Elizabeth A. Granoff

**\$25,000.00** Compensatory damages

**\$5,000.00** Discretionary damages

**\$5,000.00** General damages

**\$5,000.00** Proximate damages

**\$75,000.00** Punitive damages

Count IV Negligent Breach of Fiduciary Duty, Defendant Luke Andrew Casson,  
**\$250,000.00**

Count V Conversion, Defendant Luke Andrew Casson, **\$250,000.00**, along with a reasonable interest owed on the wrongful cancelled **\$6,000.00** second installment payment from the Settlement which was wrongfully withheld for twelve (12) years.

Count VI Breach of Contract and Covenant of Good Faith and Fair Dealings,  
Defendant Luke Andrew Casson, **\$250,000.00**

Count VII Punitive Damages, Defendant Luke Andrew Casson, **\$40,000.00**

2. I, Lance Dolph Scott, declare under penalty of perjury under the Laws of the United States of America that the amount of monies due from defendant Luke Andrew Casson, Andreou & Casson, Elizabeth A. Grandoff, and the Law Offices of Elizabeth A. Granoff as set forth in this declaration is true and correct.

FURTHER DECLARANT SAITH NOT:

Executed on: 5-28-21

Lance D. Scott  
Declarant